

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ANGEL DAVID MORALES
VALLELLANES,
Plaintiff,

v.

JOHN POTTER, UNITED STATES
POSTMASTER GENERAL, ET ALS.,
Defendants.

CIVIL NO. 97-2459 (JAG)

DAMAGES BASED ON
RETALIATION AND
DISCRIMINATION; PROHIBITED
PERSONNEL PRACTICES;
UNFAIR LABOR PRACTICES;
BREACH OF COLLECTIVE
BARGAINING AGREEMENT

TRIAL BY JURY IS HEREBY
REQUESTED

MOTION TO AMEND PLAINTIFF PROSPECTIVE
WITNESSES INCLUDED IN THE JOINT DISCOVERY SCHEDULE

COMES NOW, plaintiff Angel David Morales-Vallellanes through his legal counsel and very respectfully inform this Honorable Court:

1. On January 23, 2004 the parties in the above captioned case filed a Joint Discovery Schedule.
2. Paragraph 3 of said document stated the following:

“3. The above list of witnesses for both parties is not final as it can be increased or reduced as a result of the discovery.”
3. Plaintiff respectfully request to include the following prospective witnesses:

Frank Trinidad

Jonathan Cruz Class

José Carpene

Juan Rodríguez

Pedro Reyes

WHEREFORE, it is respectfully requested from this Honorable Court to authorize Plaintiff to amend the Joint Discovery Schedule as to include said Plaintiff list of prospective witnesses.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on April 5, 2004, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **Fidel A. Sevillano-Del Río, Esq.**, Assistant U.S. Attorney, Federico Degetau Federal Build., 150 Carlos Chardón Av., Hato Rey, Puerto Rico 00918.

S/MIGUEL E. MIRANDA-GUTIERREZ
MIGUEL E. MIRANDA-GUTIERREZ, ESQ.
ATTORNEY FOR PLAINTIFF
PMB 132, 500 Muñoz Rivera Local 15,
San Juan, Puerto Rico 00918-3349
TEL: (787) 282-0022
FAX: (787) 751-0883